

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In re:	)	Chapter 11
	)	
KidsPeace Corporation, et al. <sup>1</sup>	)	Case No. 13-14508-REF
	)	
	)	(Joint Administration Requested)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

Please take notice that the undersigned hereby enter their appearance as counsel for and on behalf of Manufacturers and Traders Trust Company ("M&T Bank") and hereby request, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Rules"); and, pursuant to Rules 2002 and 9001 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. § 342, that copies of all notices and pleadings given or filed in this case be given and served upon the parties listed below at the following addresses and telephone numbers:

Morton R. Branzburg, Esquire  
Klehr | Harrison | Harvey | Branzburg, LLP  
1835 Market Street, Suite 1400  
Philadelphia, PA 19103  
Telephone: 215-569-3007  
Facsimile: 215-568-6603  
[mbranzburg@klehr.com](mailto:mbranzburg@klehr.com)

Carol Ann Slocum, Esquire  
Klehr | Harrison | Harvey | Branzburg, LLP  
457 Haddonfield Road, Suite 510  
Cherry Hill, NJ 08002  
Telephone: (856) 486-7900  
[cslocum@klehr.com](mailto:cslocum@klehr.com)

Please take further notice that the foregoing request includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, any order,

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<sup>1</sup> The Debtors and the last four digits of their respective identification numbers are as follows: KidsPeace Corporation (3394); KidsPeace Children's Hospital, Inc. (4910); KidsPeace Mesabi Academy, Inc. (4179); KidsPeace National Centers, Inc. (4908); KidsPeace National Centers of North America, Inc. (4765); Iron Range School, Inc. (0561); and KidsPeace National Centers of New York, Inc. (1888). The Debtors' address is 5300 KidsPeace Drive, Orefield, Pennsylvania 18069.

notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced case and proceeding herein.

This Notice of Appearance and Request for Service of Papers, and any subsequent appearance, pleading, claim, or suit, shall not be deemed or construed to be a waiver of M&T Bank's right (i) to have final orders in non-core matters entered only after de novo review by a district judge, (ii) to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto, (iii) to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which M&T Bank is or may be entitled, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments M&T Bank expressly reserves.

Respectfully submitted,

KLEHR | HARRISON | HARVEY | BRANZBURG,  
LLP

By: /s/ Morton R. Branzburg  
Morton R. Branzburg, Esquire  
Klehr | Harrison | Harvey | Branzburg, LLP  
1835 Market Street, Suite 1400  
Philadelphia, PA 19103  
Telephone: 215-569-3007  
Facsimile: 215-568-6603  
mbranzburg@klehr.com

Dated: May 23, 2013

Counsel for Manufacturers and Traders Trust Company